

1 CHRISTOPHER CHIOU
Acting United States Attorney
2 Nevada Bar No. 14853
3 BIANCA R. PUCCI
ANDREW W. DUNCAN
Assistant United States Attorneys
4 501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
5 Tel: (702) 388-6336
Fax: (702) 388-6418
6 Bianca.Pucci@usdoj.gov
Andrew.Duncan@usdoj.gov
7 *Attorneys for the United States of America*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 GEORGE WASHINGTON SIMS, III,

14 Defendant.

Case No: 2:21-cr-00026-GMN-BNW

**Stipulation for a
Protective Order**

15
16 The parties, by and through the undersigned, respectfully request that the Court issue an
17 Order protecting from disclosure to the defendant GEORGE WASHINGTON SIMS, III, the
18 public, or any third party not directly related to this case, any and all unredacted discovery (the
19 “Protected Material”) in this case. The parties state as follows:

20 1. On January 27, 2021, a grand jury returned an indictment charging SIMS with
21 three counts of *Sex Trafficking of Children*, in violation of 18 U.S.C. § 1591(a) and (b)(2), two
22 counts of *Sexual Exploitation of Children*, in violation of 18 U.S.C. §§ 2251(a) and (e), and one
23 count of *Transportation of a Minor with Intent to Engage in Criminal Sexual Activity*, in violation of
24 18 U.S.C. § 2423(a). ECF No. 13.

1 2. The trial is currently set for May 17, 2021.

2 3. The government has already produced redacted discovery in excess of 3,045
3 Bates-stamped items to defense counsel. Some of the Bates stamped items contain multiple files
4 (*i.e.*, Bates stamp 1640 was a copy of a disc that included 30 mp3 files of jail calls). The
5 previously produced discovery includes, but is not limited to, police reports, 911/311 calls, jail
6 calls, victim and witness interviews, Facebook records, Snapchat records, iCloud records, cell
7 phone records, and financial records. Additional discovery is in the process of being redacted in
8 order to remove personal identifying information and has yet to be produced to defense
9 counsel. The government is also still collecting additional discovery from investigators and will
10 continue to produce discovery in due course.

11 4. The defendant, GEORGE WASHINGTON SIMS, III, has access to review and
12 obtain copies of all redacted discovery produced by the government to defense counsel.

13 5. Defense counsel has requested that the government re-produce all the discovery
14 unredacted in preparation for trial. The unredacted discovery includes personal identifying
15 information of potential victims, witnesses, and unrelated persons to this investigation. The
16 government believes that dissemination of the unredacted discovery (“the Protected Material”)
17 could reveal personal identifying information of potential victims, witnesses, and persons
18 unrelated to this investigation.

19 6. In order to protect the potential victims, witnesses, and unrelated persons
20 involved in and revealed by the Protected Material, the parties intend to restrict access to the
21 Protected Material in this case to the following individuals: attorneys for all parties, and any
22 personnel that the attorneys for all parties consider necessary to assist in performing that
23 attorneys’ duties in the prosecution or defense of this case, including investigators, paralegals,
24 experts, support staff, interpreters, and any other individuals specifically authorized by the

1 Court (collectively, the “Covered Individuals”). The defendant GEORGE WASHINGTON
2 SIMS, III, shall not review or obtain a copy of the Protected Material.

3 7. Without leave of Court, the Covered Individuals shall not:

- 4 a. make copies for, or allow copies of any kind to be made by any other person
5 of the Protected Material in this case or permit dissemination of the Protected
6 Material at the Southern Nevada Detention Center jail facility, or any other
7 detention facility where the Defendant is housed, to include leaving a copy of
8 the Protected Material at any detention facility where the Defendant is
9 housed;
- 10 b. allow any other person to read, listen, or otherwise review the Protected
11 Material;
- 12 c. use the Protected Material for any other purpose other than preparing to
13 defend against or prosecute the charges in the indictment or any further
14 superseding indictment arising out of this case; or
- 15 d. attach the Protected Material to any of the pleadings, briefs, or other court
16 filings except to the extent those pleadings, briefs, or filings are filed under
17 seal.

18 8. Nothing in this stipulation is intended to restrict the parties’ use or introduction of
19 the Protected Material as evidence at trial or support in motion practice.

20 9. The parties shall inform any person to whom disclosure may be made pursuant
21 to this order of the existence and terms of this Court’s order.

22 ///

23 ///

24 ///

1 10. The defense hereby stipulates to this protective order.

2 DATED this 26th day of April, 2021.

3 Respectfully submitted,

4 For the United States:

5 CHRISTOPHER CHIOU
6 Acting United States Attorney

7 /s/ Bianca R. Pucci

8 BIANCA R. PUCCI
9 ANDREW W. DUNCAN
10 Assistant United States Attorney

11 For the Defense:

12 RENE L. VALLADARES
13 Federal Public Defender

14 /s/ Rebecca Levy

15 REBECCA LEVY
16 ERIN GETTEL
17 Assistant Federal Public Defenders and
18 Attorneys for GEORGE WASHINGTON SIMS, III

19 **IT IS SO ORDERED:**

20 

21 _____
22 United States Magistrate Judge

23 April 30, 2021

24 _____
 Date